

LXN

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M-10-992**

UNITED STATES OF AMERICA

- against -

JUSTIN STEVEN JULBE,

Defendant.

PRE-ARRAIGNMENT

C O M P L A I N T

(21 U.S.C. §§ 952(a)  
and 960)

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EASTERN DISTRICT OF NEW YORK, SS:

MARK STURTEVANT, being duly sworn, deposes and states that he is a Special Agent with Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about August 27, 2010, within the Eastern District of New York and elsewhere, defendant JUSTIN STEVEN JULBE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On August 26, 2010, defendant JUSTIN STEVEN JULBE arrived at John F. Kennedy International Airport in Queens, New York, aboard Jet Blue Flight No. 832 from Santiago, Dominican Republic.


2. During a routine examination, the Customs and Border Protection ("CBP") Officer noticed that the defendant appeared unusually nervous and provided inconsistent answers to routine questions about the purpose of his travel. The CBP Officer proceeded to perform a pat-down search of the defendant. The defendant then admitted that he had ingested 49 foreign bodies.

3. The defendant was presented with an x-ray consent form, which he read, appeared to understand, and signed. The defendant was transported to the JFK Medical Facility where an x-ray was taken of defendant's intestinal tract. The x-ray was positive for foreign bodies.

4. On August 27, 2010, while the defendant was at the JFK Medical Facility, the defendant passed nine pellets, one of which field-tested positive for the presence of heroin.

5. Defendant will be detained at the JFK Medical Facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that  
defendant JUSTIN STEVEN JULBE be dealt with according to law.



Mark Sturtevant  
Special Agent  
Immigration and Customs  
Enforcement

Sworn to before me this  
28th day of August, 2010

UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK